CLEJ-00794-04.06-05/01/92

(840) 445-2931

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CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Michelle Glenn
Waste Management Division
United States Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: MCB Camp Lejeune Installation Restoration Program; Treatment of TCE Contaminated Groundwater at the Hadnot Point Wastewater Treatment Plant

Dear Ms. Glenn:

As discussed in our meeting on April 28, 1992 aboard Marine Corps Base Camp Lejeune with you and Mr. John Lank, we have finalized a report entitled "Interim Remedial Action Proposed Plan for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit." Our preferred alternative for remediation of the shallow aquifer involves utilizing the Hadnot Point Wastewater Treatment Plant (WTP) to treat chlorinated solvent contaminated groundwater from the Hadnot Point Industrial Area (HPIA) shallow aquifer.

As previously stated in our letter dated 6 April 1992, we assert that the TCE contaminated groundwater in the HPIA shallow aquifer should not be considered a listed hazardous waste. In your letter dated 14 April 1992 you stated that "if wastewater enters a surface impoundment at any time in the treatment process the RCRA regulations would apply (as) an 'Applicable or Relevant and Appropriate Requirement.'"

Nonetheless, in the meeting referenced above Mr. Lank indicated that the 40 CFR 261.3 allows the exclusion of the listed hazardous waste provisions for wastewater, if the generator can demonstrate that the maximum weekly usage of these solvents divided by the average weekly flow of wastewater into the headworks of the wastewater treatment plant does not exceed one (1) part per million (ppm). Although we do not consider the TCE-contaminated groundwater in the HPIA shallow aquifer as "wastewater", an analogy can be drawn between the treatment of contaminated wastewater and contaminated groundwater. As agreed during the referenced meeting, we are providing calculations detailing the theoretical concentrations of chlorinated solvents at the headworks of the Hadnot Point WTP.

Please find enclosed our Chlorinated Solvents Concentration Calculations package, which details Marine Corps Base Camp

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Lejeune information regarding hazardous material purchases, hazardous waste disposal, and Hadnot Point WTP flows for calendar year 1991. These calculations were prepared in accordance with 40 CFR 261.3. The results of these calculations demonstrate MCB Camp Lejeune potentially has 0.372 ppm of chlorinated solvent in the flow to the wastewater treatment plant. As discussed in the enclosure, this calculation is very conservative, predominantly because all the solvents were assumed to process through the Hadnot Point WTP, rather than being split among the seven (7) wastewater treatment plants aboard the Base. Complete supporting documentation for the enclosure is maintained at MCB Camp Lejeune and available for review.

More accurate information that strongly supports the enclosed calculations can be found in the report previously submitted to you entitled "Draft Supplemental Document to the Interim Remedial Action Focused Feasibility Study for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit." In Chapter 3 of the above-mentioned document, Table 3-4 reports the results of three (3) 12-hour composite samples of the influent to the Hadnot Point WTP. These composite samples were taken by Baker Environmental, Inc personnel on 4-6 February 1992 to support the Interim Remedial Action Proposed Plan. TCE was detected in only one of these samples at a concentration of one (1) part per billion.

Based on the enclosure and the aforementioned submitted report, the concentration of chlorinated solvent at the headworks of the Hadnot Point WTP during treatment of the contaminated groundwater from the HPIA shallow aquifer should be well below one part per million (ppm). Thus, if an analogy between the treatment of TCE-contaminated wastewater and TCE-contaminated groundwater is made, the treatment of TCE-contaminated groundwater from the HPIA shallow aquifer at the Hadnot Point WTP would be allowable.

In order to maintain our expedited schedule for this action, we request your written confirmation of this interpretation by 29 July 1992. If you have questions or comments, please contact Mr. Byron Brant, MCB Camp Lejeune Remedial Program Manager, at (804) 445-2931.

Sincerely,

P. A. RAKOWSKI, P.E.
Head
Environmental Programs Branch
Environmental Quality Division
by direction of the Commander

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Encl:
Chlorinated Solvents Concentrations Calculations Package

Copy to:
MCB Camp Lejeune (AC/S, Environmental Management)
N.C. DEHNR (Attn: Mr. Jack Butler)
EPA Region IV, RCRA (Attn: Mr. John Lank)

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